

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether material designated confidential by Uber should be sealed.

On March 4, 2025, Plaintiffs filed a motion to compel production of policy documents and inspection and for sanctions. Plaintiffs' motion refers to and attaches documents and information that Uber designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."

**Material To Be Filed Under Seal**

The material to be filed under seal is portion of Plaintiffs' motion, portions of the declaration in support, and the attached exhibit:

Document	Description	Designating Party
[Unredacted] Plaintiffs' Motion to Compel	Portion of briefing referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Declaration of Roopal P. Luhana	Portion of declaration referring to documents and information designated confidential or highly confidential	Uber
Exhibit A	1/27/312 Letter from V. Gromada	Uber
Exhibit B	1/31/25 Declaration of William Anderson	Uber

Document	Description	Designating Party
Exhibit C	Uber-produced document bates stamped UBER_JCCP_MDL002274069	Uber
Exhibit D	Uber-produced document bates stamped UBER_JCCP_MDL002273895	Uber
Exhibit E	Uber-produced document bates stamped UBER_JCCP_MDL002563882	Uber
Exhibit F	Uber-produced document bates stamped UBER_JCCP_MDL002267528	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Andrew R. Kaufman in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: March 5, 2025

Respectfully submitted,

By: /s/ Sarah R. London

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By: /s/ Roopal P. Luhana

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**FILER'S ATTESTATION**

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: March 5, 2025

By: /s/ Andrew R. Kaufman  
Andrew R. Kaufman